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Attorneys for Cutting Edge Credit Union

IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re)	Case No. 14-35381-rld7
JAMES JOEL HOLMAN and)	CUTTING EDGE CREDIT UNION'S
CANDICE EVANGELINE HOLMAN,)	OBJECTION TO NOTICE OF INTENT
)	TO SELL PROPERTY
Debtors.)	

Cutting Edge Credit Union ("CECU") objects to the proposed sale of property located at 240 Lancer Street, Gleneden Beach, Oregon 97388, to Ira and Jeanne Mosteller, as noticed by the Trustee on December 16, 2014, for the following reasons:

1. CECU is a secured creditor in second position on the subject property, and is owed approximately \$114,000.

2. CECU does not consent to a short sale, objects to payment of \$10,000 to the bankruptcy estate, and objects to the payment proposed real estate commission.

WHEREFORE, CECU objects to the sale for the reasons set forth above.

DATED this 7th day of January, 2015.

SUSSMAN SHANK LLP

By: /s/ Robert L. Carlton

Robert L. Carlton, OSB No. 851673
Attorneys for Cutting Edge Credit Union

*22759-001\CECU'S OBJECTION TO NOTICE OF INTENT TO SELL PROPERTY (PDF) (02018826);1

1 CERTIFICATE OF SERVICE

2 I, Debra L. Roos declare as follows:

3 I am employed in the County of Multnomah, state of Oregon; I am over the age of
4 eighteen years and am not a party to this action; my business address is 1000 SW
5 Broadway, Suite 1400, Portland, Oregon 97205-3089, in said county and state.

6 I certify that on January 7, 2015, I served, via first class mail, a full and correct
7 copy of the foregoing **CUTTING EDGE CREDIT UNION'S OBJECTION TO NOTICE**
8 **OF INTENT TO SELL PROPERTY**, to the parties of record, addressed as follows:

9 Kenneth S. Eiler, Trustee
10 PMB 810
11 515 NW Saltzman Road
12 Portland, OR 97229

13 Lynnette May & John Lynch
14 9340 SW Beaverton Hillsdale Hwy
15 Beaverton, OR 97005

16 I also certify that on January 7, 2015, I served the above-referenced document(s)
17 on all ECF participants as indicated on the Court's Cm/ECF system.

18 I swear under penalty of perjury that the foregoing is true and correct to the best
19 of my knowledge, information, and belief.

20 Dated: January 7, 2015.

21 /s/ Debra L. Roos

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Debra L. Roos, Legal Assistant

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26 *22759-001/CERT TO CECU'S OBJECTION TO NOTICE OF INTENT TO SELL PROPERTY (02018831);1